

EXHIBIT B

From: [Ferretti, Joseph S.](#)
To: ["Behram Parekh"](#)
Subject: Valsartan: ESI Protocol Provision

Behram,

This confirms our discussion today regarding the provision in the ESI Protocol allowing producing parties to entirely withhold a document within a responsive document family that is entirely non-responsive because it does not concern the product(s) at issue nor is relevant to any party's claims or defenses, provided that any such information meets the criteria for designation as "Confidential Information" or "Restricted Confidential Information." We discussed whether this applies to only Excel files or whether it applies to all file types, and you confirmed that it applies to all file types. The ZHP Parties will apply this to all file types going forward, and, per your request, we will also convey this to the other Manufacturing Defendants.

Best Regards,
Joe

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